

THE CITY OF NEW YORK

LAW DEPARTMENT

100 CHURCH STREET

NEW YORK, NY 10007

**GEORGIA M. PESTANA**Acting Corporation Counsel

E-mail: rmoston@law.nyc.gov

RACHEL K. MOSTON

Phone: 212-356-2190

Fax: 212-356-2019

October 29, 2019

BY ECF

Honorable Margo K. Brodie United States Courthouse Eastern District of New York 225 Cadman Plaza East, Courtroom 6F Brooklyn, New York 11201

Re: CHIP, RSA, et al. v. City of New York, et al., Docket No. 19-cv-04087

## Dear Judge Brodie:

I am an attorney in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, counsel for Defendants the City of New York ("City"), David Reiss, Cecelia Joza, Alex Schwarz, German Tejeda, May Yu, Patti Stone, J. Scott Walsh, Leah Goodridge, and Sheila Garcia, in their official capacities as Chair and Members, respectively, of the New York City Rent Guidelines Board (collectively, "City Defendants"). I write to respectfully request permission to file an additional 10 pages for City Defendants' Memorandum of Law in Support of City Defendants' Motion to Dismiss the Complaint in this matter. See Individual Practice Rule 3(B) (permitting 25 pages without prior permission). City Defendants require an additional ten pages to respond to the allegations set forth in the 125-page Complaint.

City Defendants have contacted all parties with respect to this request, and all parties have consented. Pursuant to this Court's Order, dated September 25, 2019, City Defendants' motion to dismiss the Complaint shall be served on November 1, 2019.

Respectfully submitted, /s/
Rachel K. Moston

Cc: Reginald R. Goeke, Esq. (via ECF)

Counsel for Plaintiffs

Michael Berg, Esq. (via ECF) Jonathan Conley, Esq. Counsel for Co-Defendant DHCR

Ellen Davidson, Esq. (via ECF) Counsel for T&N and CVH

Sean Baldwin, Esq. (via ECF)

Counsel for Coalition for the Homeless